



100 GARDEN CITY PLAZA, SUITE 500
GARDEN CITY, NEW YORK 11530
T: 516-203-7600
F: 516-281-7601

MEMORANDUM ENDORSED

April 12, 2022

VIA ECF

The Honorable Gabriel W. Gorenstein, United States Magistrate Judge
Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square
New York, NY 10007

**Re: *Liu v. Toyota Motor Credit Corporation, et al.,*
 No. 1:21-cv-10692-MKV
 Joint Letter Requesting Adjournment**

Dear Judge Gorenstein:

Plaintiff Yong Feng Liu ("Plaintiff") and Defendant Toyota Motor Credit Corporation ("Defendant"), respectfully submit this joint letter requesting an adjournment of the settlement conference scheduled for 4/18/2022, as well as a postponement of all settlement conference deadlines.

The underlying identity theft claim in this case is still being investigated by the Defendant and as such they are ill-equipped and unprepared to offer a settlement proposal, nor engage in a good faith settlement conference. Among other things, Defendant is seeking the whereabouts of the vehicle related to the identity theft, as well as further details regarding payments made on the account. The outcome of this investigation will likely directly impact the ultimate resolution, if any, that parties are willing to consider.

Based on the foregoing, the parties request an adjournment of the conference to Thursday, May 19, 2022 at 2:30 pm. We also request that all associated deadlines be postponed to align with this new date. This adjournment will allow for all parties to have a more complete understanding of the underlying claims and events in order to facilitate a more productive settlement conference. Thank you for your time and consideration of this request.

Respectfully submitted.

/s/Alain Cesar
Alain Cesar, Esq.
Tel: 516-203-7612
Email: acesar@lawsanders.group
Counsel for Plaintiff

/s/ Clayton J. Vignocchi
Clayton J. Vignocchi, Esq.
Email: clayton.vignocchi@hklaw.com
Counsel for Defendant Toyota Motor Credit Company

Conference adjourned to May 19, 2022, at 2:30 p.m. Submissions due May 13, 2022.

So Ordered.

A handwritten signature in black ink, appearing to read "Gabriel W. Gorenstein".

GABRIEL W. GORENSTEIN
United States Magistrate Judge

April 13, 2022